

## **EXHIBIT 23**

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.,	)	
Plaintiff,	)	CV-04-2799
vs.	)	(NG) (VVP)
	)	
ARAB BANK, PLC.,	)	
Defendant.	)	
-----x		
PHILIP LITTLE, et al.,	)	
Plaintiff,	)	CV-04-5499
vs.	)	(NG) (VVP)
	)	
ARAB BANK, PLC.,	)	
Defendant.	)	
-----x		
OLAN ALMOG, et al.,	)	
Plaintiff,	)	CV-04-5564
vs.	)	(NG) (VVP)
	)	
ARAB BANK, PLC.,	)	
Defendant.	)	
-----x		
ROBERT L. COULTER, SR., et al.,	)	
Plaintiff,	)	CV-04-365
vs.	)	(NG) (VVP)
	)	
ARAB BANK, PLC.,	)	
Defendant.	)	

(Caption continued on next page)

VIDEOTAPED DEPOSITION OF SHAYNA E. GOULD  
New York, New York  
Thursday, March 8, 2007

Reported by:  
Jeffrey Benz, RMR, CRR  
JOB NO. 10482

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1 Gould  
2 Q. How long have you lived in Washington  
3 Heights?  
4 A. Four years, three and a half.  
5 Q. So prior to Washington Heights, you  
6 only lived in Skokie?  
7 A. Yeah. And Israel.  
8 Q. Are you a U.S. citizen?  
9 A. Yes.  
10 Q. Are you a citizen of any other  
11 country?  
12 A. No.  
13 Q. When you lived in Skokie, did you live  
14 with your parents?  
15 A. Mostly, yeah.  
16 Q. Where else did you live?  
17 A. I also lived in West Rogers Park with  
18 a roommate.  
19 Q. Was that while you were in school?  
20 A. I was in school and recovering.  
21 Q. Who was your roommate?  
22 A. Talia Rubino.  
23 Q. And how long did you live with this  
24 roommate?  
25 A. Less than a year.

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1 Gould  
2 Q. Can you give me the names and ages of  
3 your immediate family members?  
4 A. My father's Ron Gould. I think he's  
5 56.  
6 My mom is Elise Gould, 54 -- 55.  
7 My sister, Jessica Rine, is 28.  
8 Q. And that's it?  
9 A. Brother-in-law?  
10 Q. Okay. And where does your sister  
11 live?  
12 A. In West Rogers Park, in Chicago.  
13 Q. And where do your parents live?  
14 A. My mom lives in Skokie. My dad lives  
15 in the city, Chicago.  
16 Q. Are your parents divorced?  
17 A. They are now.  
18 Q. Were they divorced at the time --  
19 A. No.  
20 Q. -- of the incident?  
21 A. No.  
22 Q. You said that you had lived in Israel.  
23 When was that?  
24 A. I lived there 2000, 2001. School  
25 year.

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1 Gould  
2 And 2001-2002 school year up until my  
3 attack and a bit after. I think it was March  
4 when I left.  
5 Q. March. March of '02?  
6 A. Yeah.  
7 Q. Where did you live in Israel?  
8 A. I lived in Harnauf, Jerusalem.  
9 Q. How close was that to the location of  
10 the incident in which you were involved?  
11 A. A half-hour bus ride.  
12 Q. Half hour.  
13 A. 40 minutes.  
14 Q. How far would you say -- do you know  
15 how far the mileage would be?  
16 A. That was on a bus. So I don't know.  
17 Q. You don't know. Okay.  
18 Did you live in any other locations in  
19 Jerusalem or Israel?  
20 A. No.  
21 Q. You said it was during the school  
22 year, so which school were you attending?  
23 A. It was Neve College for Women.  
24 Q. Okay. And how long were you a student  
25 there?

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1 Gould  
2 A. First year. And then up until my  
3 attack in the second year.  
4 Q. What kind of program are you enrolled  
5 in?  
6 A. It's Jewish studies for women,  
7 Talmudic studies.  
8 Q. How long was that program supposed to  
9 be?  
10 A. The first one was a year.  
11 Q. It's two separate programs?  
12 A. Yeah. One is the initial program when  
13 you get out of high school. You go to this one,  
14 it's called Michlet Ester. And then the  
15 other -- then I went on to a second year, and  
16 that was Neve. Neve Israel, college for women.  
17 Q. And do you get some sort of degree  
18 from those programs?  
19 A. Not necessarily.  
20 Q. Is it in preparation for teaching?  
21 A. That's a good question.  
22 No.  
23 Q. No? Were you planning on going into  
24 teaching?  
25 A. No.

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1 Gould  
2 Q. Okay. Do you have any military  
3 experience?  
4 A. No.  
5 Q. You said that you worked summers to  
6 pay for your way to Israel?  
7 A. Yes.  
8 Q. Where did you work?  
9 A. I worked the first -- the first year,  
10 I worked at Tov Foods, which is a gourmet  
11 grocery store in Skokie. And my second trip, I  
12 worked at Bagel Country. It's a kosher  
13 restaurant in Skokie.  
14 And I worked at J. Crew, also.  
15 Q. Did you get a good discount?  
16 A. Yes, I did.  
17 Q. So you took two trips to Israel.  
18 A. Uh-huh.  
19 Q. Were those both for your studies?  
20 A. Yes.  
21 Q. Okay. So when you went to the first  
22 trip, I believe you said in 2000 --  
23 A. Yes.  
24 Q. Did you come back to the United States  
25 and then return to Israel?

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1 Gould  
2 A. For the summer.  
3 Q. Okay. You came back for the summer?  
4 A. Uh-huh.  
5 Q. What did you do that summer, if you  
6 recall?  
7 A. I worked.  
8 Q. To go back?  
9 A. Uh-huh. Yes.  
10 Q. Before I asked you a little bit -- I  
11 asked you the names and ages of your family  
12 members. Could you tell me a little bit about  
13 your relationship with them, with your parents,  
14 for instance?  
15 A. Yeah.  
16 Q. Okay.  
17 A. What do you want to know?  
18 Q. Would you say that you're very close  
19 family?  
20 A. We're close.  
21 Q. You spent a lot of time together?  
22 A. Well, I'm in New York.  
23 Q. Do they come visit often?  
24 A. No.  
25 Q. Do you get to get back to Illinois to

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1 Gould  
2 visit your family?  
3 A. Every once in a while.  
4 Q. And your sister is there as well?  
5 A. Yes.  
6 Q. How often would you say you go back  
7 and visit?  
8 A. As often as I can afford to.  
9 Q. And you said your sister is married.  
10 A. Yes.  
11 Q. Does she have any children?  
12 A. Yes.  
13 Q. How many?  
14 A. Two.  
15 Q. How old are they?  
16 A. Three, and seven months.  
17 Q. I just want to get into a little bit  
18 about the incident and the lawsuit and the  
19 complaint. In which --  
20 Is that your phone?  
21 A. Message.  
22 Q. Okay. And the complaint which you are  
23 named as a plaintiff. You said that you read  
24 the complaint in preparation for this deposition  
25 today?

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1 Gould  
2 A. Briefly.  
3 Q. Okay. Had you seen the complaint  
4 prior to today?  
5 A. Possibly.  
6 Q. And are your parents and your sister  
7 also named as plaintiffs in the complaint?  
8 A. Yes.  
9 Q. And can you confirm for me the date of  
10 the incident?  
11 A. January 22, 2002.  
12 Q. Okay. And can you tell me why you're  
13 involved in this lawsuit?  
14 A. Because I was shot by a terrorist.  
15 Q. Okay. And what claims are you suing  
16 for?  
17 A. I relied on my lawyers to decide.  
18 Q. Would it be fair to say that you're  
19 suing for physical and emotional damages?  
20 A. Yes. At least.  
21 Q. Sure. How did you become involved in  
22 this lawsuit?  
23 A. I don't remember, exactly.  
24 Q. Do you know if someone approached you,  
25 or did you see it in the news --

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